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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

GREENE/GUILFORD ENVIRONMENTAL
ASSOCIATION, a non-profit corporation
incorporated under the laws of the
Commonwealth of Pennsylvania, CITIZENS
FOR PLANNED COMMUNITY GROWTH,
an unincorporated association organized
under the laws of the Commonwealth of
Pennsylvania, PAUL B. AMBROSE, JOHN G.
ENDERS, CHARLES F. RAHAUSER, BETSY
RAHAUSER, DOUGLAS A. WARNOCK, U.X.
VAGNERINI, THOMAS W. BUNDY,
STEPHEN P. BUCHER, ROGER J.
ROBERTSON, JAMES A. STRITE, JR., DAVID
A. GUTHRIE,

Plaintiffs

CIVIL ACTION NO.
1:CV-01-0910

(Judge Rambo)

v.

KEN WYKLE, Administrator, Federal
Highway Administration, ROBERT GATZ,
Federal Highway Administration,

Defendants

and

BRADLEY L. MALLORY, Secretary for
The Department of Transportation,
Commonwealth of Pennsylvania,
Intervenor.

*Plaintiffs
Defendants
and
Intervenor*

MOTION FOR ENLARGEMENT OF TIME

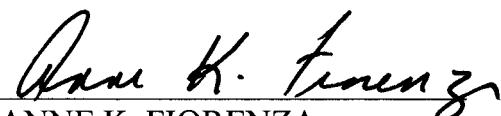
Defendants Ken Wykle and Robert Gatz (Federal Defendants) and intervenor Bradley L. Mallory, by and through their undersigned counsel, hereby move this Court for an enlargement of time in which to respond to plaintiffs' Motion to Supplement the Record and, in support thereof, state as follows:

1. This is a citizens' challenge to the decision of the Federal Highway Administration to construct a new interchange in the Chambersburg area.
2. On or about December 12, 2001, plaintiffs filed a motion to supplement the record:
3. Defendants and intervenors must respond on or before December 31, 2001;
4. Because of the intervening holidays, and because defendants' counsel has been, and will continue to be involved in a mediation during the time this motion is pending, counsel respectfully asks this Court to grant an enlargement of time through January 7, 2001.

Wherefore, defendants respectfully ask that the Court grant this motion for enlargement of time.

Respectfully submitted,

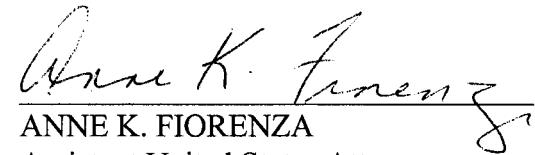
MARTIN C. CARLSON
United States Attorney


ANNE K. FIORENZA
Assistant United States Attorney
Federal Building, 2nd Floor
228 Walnut Street, PO Box 11754
Harrisburg, PA 17108-1754
Phone: 717-221-4482
Fax: 717-221-2246

DATE: December 26, 2001

CERTIFICATE OF CONCURRENCE

I, Anne K. Fiorenza, hereby certify that on December 21, 2001 I spoke to Thomas A. Linzey, Esquire, counsel for the plaintiff. Mr. Linzey concurs in this motion.


ANNE K. FIORENZA
Assistant United States Attorney

Date: December 26, 2001

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion to be competent to serve papers.

On this 26th day of December, 2001, she served a copy of the foregoing document by placing said copy in a postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Harrisburg, Pennsylvania to:

Thomas Alan Linzey, Esquire
Community Environmental Legal Defense Fund
2859 Scotland Road
Chambersburg, PA 17201


REBECCA A. PLESIC
Legal Secretary